

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CIVIL NO. 98-1664 (CCC)
)	CIVIL NO. 98-2344 (CCC)
vs.)	Consolidated Cases
)	
33.92536 ACRES OF LAND, MORE)	
OR LESS, SITUATED IN VEGA BAJA,)	
COMMONWEALTH OF PUERTO RICO,)	
AND JUAN PIZA BLONDET, AND)	
UNKNOWN OWNERS)	
)	
Defendants.)	

**JOINT MOTION REQUESTING A STATUS CONFERENCE
TO DISCUSS ESTABLISHING A NEW CASE MANAGEMENT ORDER**

Plaintiff United States of America and Defendant Juan Piza-Blondet respectfully submit this Joint Motion Requesting A Status Conference to Discuss Establishing A New Case Management Order. There is no active Case Management Order or trial date set in this proceeding.

In light of the Court's Order of May 31, 2005 (Docket No. 113), the Government believes it is necessary to further investigate the probability of re-zoning. Both Mr. Pia-Blonde and the United States, moreover, believe that proper resolution of this litigation requires production of new appraisal reports. As a result, the parties wish to discuss including a discovery period in any new Case Management Order.

This Motion therefore requests that the Court set a status conference at the Court's convenience during or after the week of July 5, 2005 in order to discuss these issues. In the meantime, Plaintiff and Defendant will continue settlement discussions, although the parties believe that additional discovery will facilitate settlement. Counsel for Mr. Piza-Blondet has

reviewed the text of this motion and the undersigned counsel is authorized to file it as a joint motion.

Respectfully submitted this 8th day of June 2005.

Counsel for Plaintiff United States

s/ Jeffrey M. Tapick

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